

Avram E. Frisch, Esq. (AF-0187)
The Law Office of Avram E. Frisch LLC
1 University Plaza, Suite 119
Hackensack, NJ 07601
(201) 289-5352
frischa@avifrischlaw.com
Attorney for Plaintiff

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

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Devi Rajshri Sethumadhava Menon
Plaintiff

Civil Action No. 2:21-cv-08384-KM-
JBC

V.

Ward Corbett and Catalyst Partners

Defendants

**DECLARATION OF AVRAM E.
FRISCH IN SUPPORT OF
PLAINTIFF'S REQUEST TO
ENTER DEFAULT JUDGMENT
AGAINST CATALYST PARTNERS**

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Avram E. Frisch, Esq of full age, hereby declares, under penalty of perjury pursuant to 28 U.S.C. § 1746, as follows:

1. I am an attorney at law licensed to practice in the State of New Jersey and admitted to practice before this Court, and I represent Plaintiff in the instant matter. I make this declaration in support of Plaintiff's Request to Enter Default judgment against Defendant Catalyst Partners.
2. The Plaintiff has diligently worked to effectuate service against Defendant Catalyst Partners, and ultimately effectuated service by alternative means as set forth in Counsel's declaration of diligent inquiry pursuant to New Jersey Court

- Rule 4:4-4(b) on February 14, 2022 (ECF #9), which is incorporated herein by reference.
3. Plaintiff has also been diligently attempting to serve Mr. Corbett, but has yet to successfully do so. As such, this application was delayed pending motion practice relating to the service of Mr. Corbett, in an attempt to seek entry of judgment only one time.
 4. As it is uncertain that Mr. Corbett will be successfully served, Plaintiff is seeking entry of judgment against Catalyst, which has been served in accordance with the New Jersey Court Rules, as they have been incorporated by the Federal Rules of Civil Procedure.
 5. Despite being served successfully, Catalyst has failed to answer or otherwise respond to the Complaint.
 6. Accordingly, Plaintiff respectfully requests that a default judgment be entered against Catalyst.
 7. I declare under penalty of perjury that the foregoing is true and correct. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

Dated: January 8, 2023

/s/ Avram E. Frisch
Avram E. Frisch
Attorney for Plaintiff